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9-16-0
SC

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

VINCENZO MAZZAMUTO,
Plaintiff,

v.

UNUM PROVIDENT
CORPORATION, et al.,
Defendants

CIVIL ACTION
NO. 1:CV-01-1157

JUDGE KANE

FILED
HARRISBURG, PA

SEP 13 2002

MARY E. D'ANDREA, CLERK
per [Signature]

**DEFENDANTS' RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION
TO EXTEND THE DEADLINE FOR EXPERT REPORTS**

Defendants UNUMProvident Corporation, Paul Revere Life Insurance Company and New York Life Insurance Company ("Defendants") hereby respond in opposition to plaintiff's motion for leave to extend the deadline for submission of expert reports.

Plaintiff's motion should be denied for the reasons set forth in the accompanying brief which is incorporated herein in its entirety including that (1) the deadline for identification of expert witnesses has passed and the late designation of an expert roughly one month before trial would be unduly prejudicial to defendants; and (2) the proposed expert testimony would be inadmissible.

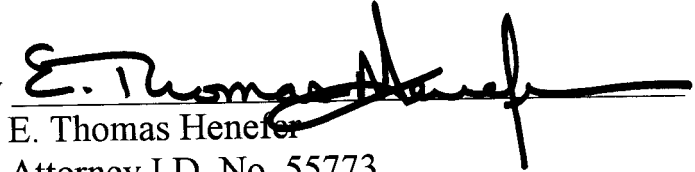
WHEREFORE, for the reasons set forth above and in the accompanying Memorandum of Law, Defendants respectfully request this Court to

deny Plaintiff's motion to extend the deadline for expert reports.

Dated: September, 13, 2002

STEVENS & LEE

By



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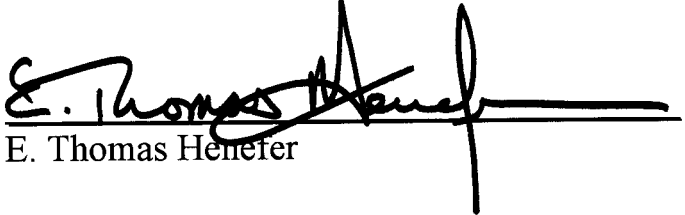
(610) 478-2000

Attorneys for Defendants UNUM Provident
Corporation, Paul Revere Insurance Company,
and New York Life Insurance Company

CERTIFICATE OF SERVICE

I, E. Thomas Henefer, Esquire, certify that on this date, I served a certified true and correct copy of the foregoing Response and Memorandum of Law upon the following counsel of record, by depositing the same in the United States mail, postage prepaid, addressed as follows:

Richard C. Angino, Esquire
4503 North Front Street
Harrisburg, PA 17110-1708


E. Thomas Henefer

Date: September 13, 2002